

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THE UNITED STATES OF AMERICA
ex rel. JULIE LONG,

Plaintiffs,

V.

JANSSEN BIOTECH, INC.,

Defendant.

Civil Action No.
16-12182-FDS

**MOTION TO FILE DOCUMENT UNDER SEAL
IN ACCORDANCE WITH PROTECTIVE ORDER**

Plaintiff-relator Julie Long hereby moves to file under seal Exhibit 3 to Plaintiff's Memorandum of Law in Support of Motion to Compel the Production of Documents and a Complete and Proper Privilege Log (ECF No.224) for the following reasons:

1. The Protective Order governing this action requires that if a party wishes to use documents or information that have been designated as “Confidential Material” or “Confidential Material – Attorneys Eyes Only” in any papers filed with the Court and wishes for the Court to review such documents or information, the filing party is required to file the papers under seal, and the papers are to remain sealed until further order of the Court. *See* Protective Order (ECF No. 103) at § VIII.B.

2. Plaintiff wishes to submit a copy of defendant Janssen Biotech, Inc.’s privilege log as Exhibit 3 to Plaintiff’s Memorandum of Law in Support of Motion to Compel the Production of Documents and a Complete and Proper Privilege Log (ECF No.224). Janssen has designated the privilege log as “Confidential Material” pursuant to the Protective Order.

Plaintiff respectfully requests that the Court grant Plaintiff permission to file a copy of Janssen's privilege log (Exhibit 3 to ECF No.224) under seal.

Dated: December 3, 2021

Respectfully submitted,

/s/ Theodore J. Leopold

Theodore J. Leopold (admitted pro hac vice)
Leslie M. Kroeger (admitted pro hac vice)
Diana L. Martin (admitted pro hac vice)
Poorad Razavi (admitted pro hac vice)
COHEN MILSTEIN SELLERS & TOLL PLLC
11780 U.S. Highway One, Suite N500
Palm Beach Gardens, FL 33408
(561) 515-1400
tleopold@cohenmilstein.com
lkroeger@cohenmilstein.com
dmartin@cohenmilstein.com
prazavi@cohenmilstein.com

Casey M. Preston (admitted pro hac vice)
Gary L. Azorsky (admitted pro hac vice)
Jeanne A. Markey (admitted pro hac vice)
COHEN MILSTEIN SELLERS & TOLL PLLC
1717 Arch Street, Suite 3610
Philadelphia, PA 19103
(267) 479-5700
cpreston@cohenmilstein.com
gazorsky@cohenmilstein.com
jmarkey@cohenmilstein.com

Jonathan Shapiro (BBO No. 454220)
SHAPIRO & TEITELBAUM LLP
90 Canal Street, Suite 120
Boston, MA 02116
(617) 742-5800
jshapiro@jsmtlegal.com

Counsel for Plaintiff Relator Julie Long

CERTIFICATE OF SERVICE

I hereby certify on this 3rd day of December, 2021, that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Theodore J. Leopold
Theodore J. Leopold (admitted pro hac vice)